

REMARKS/ARGUMENTS

In response to the Official Action mailed January 27, 2005, Applicants have amended their application and request favorable reconsideration. No claims are added or canceled in this Amendment so that claims 40-59 remain pending. No new matter has been added.

Claims 40 and 50 are amended to add "and static" to occurrences of the term "predefined." This amendment is supported by the specification at, for example, p. 13, lines 18-25; p. 15, lines 10-20; and p. 16, lines 6-10.

The Official Action rejects all of the claims 40-59 based on prior art of record. Specifically, independent claims 40 and 50 and dependent claims 45-48 and 55-58 are rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Patent 5,361,361 to Hickman et al. (hereinafter "Hickman"). Claims 44, 49, 54 and 59 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Hickman in view of U.S. Patent 6,236,989 to Mandyam et al. (hereinafter "Mandyam"), and claims 41-43 and 51-53 are rejected as being unpatentable over Hickman in view of U.S. Patent 5,825,356 to Habib et al. (hereinafter "Habib"). Those rejections are respectfully traversed.

In the Advisory Action mailed April 19, 2005, the Examiner argues that Applicants' previous arguments presupposed the meaning of the phrase "being predefined" as associated with a narrow meaning to give rise to the argued "static taxonomy." The Examiner further argues that this narrow meaning is not explicitly present in the claims, and that Hickman teaches the limitations of the claims under the broadest interpretation of the phrase "being predefined." Accordingly, in order to expedite allowance, Applicants have amended independent claims 40 and 50 to include explicit recitation of a "static" taxonomy structure.

The references or record do not teach or suggest providing mapping data for mapping help topics from different vendors into a unified taxonomy structure wherein the first level of categories is predefined and static. In contrast to the claims of the present invention, Hickman does not disclose that the various topics and subtopics are fit into a static taxonomy structure. *See* col. 7, lines 30-67; Fig. 5; and Fig. 6 of Hickman. For example, consider a computer where only application 1 and application 2 are installed. Under the help utility of Hickman, the only topics present in the taxonomy structure of help topics are those topics that are present in application 1 and application 2. If application 2 is uninstalled and replaced with application 3, the taxonomy structure at the first level also changes. Thus, Hickman does not teach that a first level of categories in the unified taxonomy structure being predefined and static as recited in amended claims 40 and 50.

Still further, the rejection of claims 41-49 and 51-59 rely on the principle that Hickman anticipates claims 40 and 50, which, as previously explained, it does not. Accordingly, *prima facie* obviousness has not been established, and the rejection should be withdrawn.

Reconsideration and withdrawal of the rejections, as well as prompt allowance of the pending claims, are earnestly solicited.

Respectfully submitted,


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